



Heather Shirley Smith
Deputy General Counsel

Duke Energy
40 W. Broad Street
Suite 690
Greenville, SC 29601

o: 864.370.5045

f: 864.370.5183

heather.smith@duke-energy.com

September 27, 2018

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
The Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia SC 29210

**Re: Self – Report Common Digital Platform
PSCSC Docket No. 2011-158-E**

Dear Mrs. Boyd:

I am writing to inform the Commission that certain Customer Information was disclosed in error in between March 2018 and September 2018 pertaining to eight Duke Energy Progress, LLC (“DEP” or the “Company”) customers under the following circumstances:

1) Duke Energy Corporation (“Duke Energy”) launched My Account as part of the Common Digital Platform in January 2018, to provide a common experience for legacy Duke Energy and legacy Progress Energy online customers. Using My Account, customers can pay bills, enroll in billing programs and view usage for all their electric service accounts across Duke Energy jurisdictions. Customer data displayed in My Account includes the following: email address associated with the account; amount due; customer address and phone number; account number; billing and payment history; usage analysis; payment options and ability to manage banking accounts. However, Personally Identifiable Information is not displayed.

2) Between March and September 2018, eight customers reported that under their profile they could view the account information of another customer. For each incident, the customer could only view account level information, not account profile information. One of these customers was located in South Carolina.

3) Duke Energy conducted an investigation and determined that the incidents occurred as the result of incorrect manual entry of information in the legacy Duke Energy and legacy

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Progress Energy source billing systems. Examples include incorrect entry of a Social Security Number and incorrect association of accounts when accounts were set up. While a reason for some of these CDP issues was incorrect manual entry of Social Security Numbers (“SSN”), there were other ways that accounts were mistakenly connected not associated with SSNs. As an example, CDP issues could have been a result of a customer calling to add a person to their account and a representative entering incorrect information (not SSN). Moreover, the incorrect manual entry may have occurred at the time of initial application or at any time during the lifecycle of the account. These irregularities may have existed for years within the source systems. The My Account functionality made these data irregularities visible to affected customers, whereas that visibility did not exist with prior customer interfaces.

4) To help prevent such data entry errors in the future, DEP’s customer contact center execution support team has reinforced their established processes and will continue to do so on a regular basis. Additionally, DEP customer service representatives receive yearly training on the importance of securing Customer Information.

The North Carolina Code of Conduct, approved by the North Carolina Utilities Commission in its September 29, 2016 *Order Approving Merger Subject to Regulatory Conditions and Code of Conduct*, in Docket Nos. E-2, Sub 1095, E-7, Sub 1100 and G-9, Sub 682, and further adopted, as applicable to South Carolina, via the Public Service Commission of South Carolina’s Order No. 2016-772, dated November 2, 2016, contains several provisions relating to the disclosure of Customer Information. Customer Information means:

Non-public information or data specific to a Customer or a group of Customers, including, but not limited to, electricity consumption, natural gas consumption, load profile, billing history, or credit history that is or has been obtained or compiled by DEC, DEP or Piedmont in connection with the supplying of Electric Services or Natural Gas Services to that Customer or group of Customers.

If Customer Information is inappropriately disclosed, Section III(A)(2)(k) of the Code of Conduct provides the following:

Should any inappropriate disclosure of DEC, DEP or Piedmont Customer Information occur at any time, DEC, DEP or Piedmont shall promptly file a statement with the Commission describing the circumstances of the disclosure, the Customer Information disclosed, the results of the disclosure, and the steps taken to mitigate the effects of the disclosure and prevent future occurrences.

In addition, Regulatory Condition No. 14.4 provides that such statements should be filed with the Commission(s). Pursuant to this Regulatory Condition and the above-cited provisions of the Code of Conduct, DEP is filing this letter, in an abundance of caution, to report that

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Customer Information had been inappropriately disclosed, under the circumstances described above.

DEP takes its obligation to protect Customer Information very seriously and has acted as quickly as possible to rectify this situation. For the foregoing reasons, DEP regrets the error.

Please do not hesitate to contact me if you have any questions or require any further information.

Sincerely,



Heather Shirley Smith

cc: Nanette Edwards, Office of Regulatory Staff
Dawn Hipp, Office of Regulatory Staff
Jeff Nelson, Office of Regulatory Staff
Sarah Johnson, Office of Regulatory Staff